

HONORABLE ROBERT H. WHALEY

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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE**

JENNIFER LANE:

NO. 11-309 RHW

Plaintiff,

DEFENDANTS' TRIAL EXHIBIT LIST

GRANT COUNTY, a Washington
municipal corporation;

Defendant.

The Defendant Grant County designates the following Exhibits that may be used at trial.

EXHIBIT LIST

EX #	DESCRIPTION OF EXHIBIT	OFFER	ADMIT
		(Y/N)	(Y/N)
101.	Employee Self Appraisal and performance Review Worksheet;		
Lane Dep. Ex. No 1 [Bates 003610-003611]			
102.	Employee Self Appraisal and performance Review Worksheet;		
Lane Dep. Ex. No 2 [Bates 002057-002058]			
103.	April 24, 2006 Memo Re: Continuing Concerns Regarding		
Employee Relations – PARC			

EX #	DESCRIPTION OF EXHIBIT	OFFER (Y/N)	ADMIT (Y/N)
	Lane Dep. Ex. No.3 [Bates 002616-002617]		
104.	April 12, 2004 Memo RE: Employee Complaint Lane Dep. Ex. No. 4 [Bates 002618]		
105.	July 12, 2004 Memo RE: Employee Relations Lane Dep. Ex. No. 5 [Bates 002619-002620]		
106.	March 21, 2005 Memo RE: Employee Relations – Prevention & Recovery Center PARC Lane Dep. Ex. No. 6 [Bates 002621-002622]		
107.	March 23, 2005 Memo RE: Survey Recommendation Lane Dep. Ex. No.7 [Bates 002623-002625]		
108.	April 25, 2005 Memo RE: PARC Employee Survey Lane Dep. Ex. No. 8 [Bates 002626]		
109.	April 10, 2006 Memo RE: Compensation Plan Administration Lane Dep. Ex. No. 9 [Bates 002628]		
110.	September 5, 2006 Draft to attorneys Ehlis and Menke RE: PARC Investigation Lane Dep. Ex. No. 10 [Bates 002653]		
111.	September 5, 2006 Letter to attorneys Ehlis and Menke from Attorney Stephson RE: PARC Recommendations Lane Dep. Ex. No. 11 [Bates 002660-002663]		
112.	March 2005 Memo RE: Consultation Progress Report Lane Dep. Ex. No. 12 [Bates 002681-002684]		
113.	PARC Combined Income Statement – 12 Month View Lane Dep. Ex. No. 13 [Bates 002159-002169]		
114.	Grant County PARC Expenditures Worksheet Lane Dep. Ex. No. 14 [Bates 001927-001954]		
115.	January 27, 2009 Performance Evaluation of Jennifer Lane Hechler Dep. Ex. No. 1 [No Bates]		
116.	6/18/09 Request for FMLA [Bates 000054-000060]		
117.	US Department of Labor FMLA Form Hechler Dep. Ex. No. 3 [No Bates]		
118.	June 24, 2009 Letter to Jennifer Lane RE: FMLA Request Hechler Dep. Ex. No. 4 [No Bates]		
119.	July 09, 2009 Letter to Jennifer Lane RE: FMLA Non-Reinstatement/Position Opening [Bates 000225]		
120.	September 1, 2009 Letter to Jennifer Lane RE: Separation Date/Position Opening [Bates 000066]		
121.	September 3, 2009 Personnel Action Request Form		

EX #	DESCRIPTION OF EXHIBIT	OFFER (Y/N)	ADMIT (Y/N)
	[Bates 002080-002082]		
122.	September 8, 2009 Personnel Action Request Form [Bates 000067]		
123.	E-Mail from Jennifer Lane RE: Exit Step Empty Office Jennifer Lane [Bates 000265-000267]		
124.	E-Mail from Jennifer Lane RE: Exit Step Empty Office Jennifer Lane [Bates 000268]		
125.	October 7, 2009 Handwritten Notes from Jennifer Lane's Exit Interview [Bates 003407-003410]		
126.	Jennifer Lane Resume [Bates 000355-000384]		
127.	Jennifer Lane Resume [Bates 000381-000384]		
128.	Grant County PARC, Job Description for the Position of Administrator/Chemical Dependency Coordinator (2000) [Bates 000374-000376]		
129.	Grant County Job Description for the Position of Administrator/County Chemical Dependency Coordinator (2004) [Bates 000202-000203]		
130.	May 08, 1990 letter to Grant County Commissioners [Bates 000238]		
131.	January 12, 1998 letter from Tim Snead to Jennifer Lane [Bates 000171]		
132.	May 21, 2001 Family Medical Leave Act – Employer Response [000090-000092]		
133.	November 29, 2005 Grant County Family Medical Leave Act- Employer Response [000071-000075]		
134.	February 23, 2005 Memo to Jennifer Lane RE: Personnel Complaint [Bates 000232]		
135.	February 23, 2005 Letter to Tammy Francis RE: Response to Complaint [Bates 000233]		
136.	February 23, 2005 Memo to Jennifer Lane RE: Personnel Complaint [Bates 000234]		
137.	February 23, 2005 Letter to Armentia Tenner RE: Response to Complaint [Bates 000235-000236]		

EX #	DESCRIPTION OF EXHIBIT	OFFER (Y/N)	ADMIT (Y/N)
138.	February 5, 2008 Letter to Tammy Francis RE: Email Dated 1/23/08 [Bates 003523]		
139.	February 22, 2008 E-Mail to Jennifer Lane RE: Training [Bates 003522]		
140.	November 18, 2008 Letter from Kirk Ehlis RE; Grant County PARC [Bates 003517-003521]		
141.	Personnel Action Request Recommendation [002086]		
142.	January 26, 2009 Grant County Board of Commissioners Minutes [Carter Dep. Ex. No. 1; No Bates]		
143.	March 2, 2009 BOCC Monthly Meeting Agenda [Bates 002062]		
144.	April 13, 2009 BOCC Agenda [Bates 002096]		
145.	May 05, 2009 E-Mail from Jalane Christian-Stoker [Stoker Dep. Ex. No.1]		
146.	May 07, 2009 Integration of PARC Minutes [Hechler Dep. Ex. No. 6; No Bates]		
147.	May 28, 2009 E-Mail from Jalane Christian Stoker RE: ACHS E-Mail List [Bates 002120]		
148.	June 09, 09 BOCC Agenda [Bates 002037]		
149.	June 09, 2009 Memo to Jennifer Lane RE: Grant Mental Healthcare and PARC Integration [Carter Dep. Ex. No. 3; No Bates]		
150.	June 15, 2009 Memo to Jalane Christian –Stoker and Jennifer Lane RE: Grant Mental Healthcare and PARC Integration [Carter Dep. Ex. No.4; No Bates]		
151.	June 15, 2009 E-Mail to Jennifer Lane from June Strickler RE: Memo re: CarolAnn [Bates 002123-002124]		
152.	June 17, 2009 E-Mail to Jennifer Lane and Carolann Swartz RE: PARC Integration Action Grid		
153.	PARC Integration Action Grid [Bates 002063-002066]		
154.	June 19, 2009 Integration of PARC Minutes [Stoker Dep. Ex. No. 4; No Bates]		
155.	June 19, 2009 Letter to Tammie Hechler RE: Splitting the duties of Finance and Information Services [Bates 000856-000587]		

EX #	DESCRIPTION OF EXHIBIT	OFFER (Y/N)	ADMIT (Y/N)
156.	June 23, 2009 E-Mail to Jennifer Lane RE: Grant County Jennifer Lane [Bates 003402-003403]		
157.	Medical Records from Pioneer Medical Center [Bates 000579-000625; 000669-000727]		
158.	June 29, 2009 E-Mail from Jalane Christian-Stoker RE: PARC Integration [Bates 002133]		
159.	July 1, 2009 E-Mail from Jalane Christian-Stoker RE: Meeting with Noemi [Bates 002142]		
160.	July 02, 2009 Memo to Department Heads, Elected Officials and Administrative Officials RE: Merger of PARC and Grant County Healthcare [Bates 00387]		
161.	July 02, 2009 Integration of PARC Agenda [Bates 002148]		
162.	July 02, 2009 Handwritten Notes RE: PARC Integration [Bates 002146-002147]		
163.	July 6, 2009 E-Mail to Noemi Alfaro RE: GC PARC Moving [Bates 002149]		
164.	July 07, 2009 E-Mail to Jalane Christian-Stoker RE: Grant County PARC #13 002200 (Admin Chg & Relocation) [Bates 002151-002152]		
165.	July 8, 2009 Position Opening – Director of Financial Services - Grant Integrated Services [Bates 003390]		
166.	July 22, 2009 Chemical Dependency Section Meeting Minutes [Bates 000046-000053]		
167.	July 24, 2009 County Program Agreement/ DSHS [Bates 000041]		
168.	July 24, 2009 Handwritten Notes [Bates 002186-002189]		
169.	July 28, 2009 Handwritten Notes [002190-002197]		
170.	July 30, 2009 Handwritten Notes [Bates 002198-002200]		
171.	August 4, 2009 Meeting Agenda [Bates 002207]		
172.	August 19, 2009 E-Mail from Jalane Christian-Stoker RE: Question [Bates 002055]		
173.	August 8, 2009 Grant County PARC Advisory Board/Community		

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EX #	DESCRIPTION OF EXHIBIT	OFFER (Y/N)	ADMIT (Y/N)
	Mobilization Board Minutes [Bates 002208-002211]		
174.	August 28, 2009 Letter to Tammie Hechler from Jalane Christian-Stoker [Bates 002077-002079]		
175.	Recommended Organizational Structure [Bates 002122]		
176.	Plan for and Implement Integration of PARC [Stoker Dep. Ex. No.3; No Bates]		
177.	December 2009 Expense-Expenditure Summary [Bates 000978-000986]		
178.	Summarized Transaction Activity Report [Bates 003394-003400]		
179.	Top 10% Wage Earners [Bates 003415-003427]		
180.	2009 Wages (Jan. 1, 2009 through June 30, 2009) [Bates 003392-003401]		
181.	Inland Neurosurgery and Spine Records for Jennifer Lane [Bates 000782-000783]		
182.	Letter from Jennifer Lane to her Primary Care Doctors re: Pain and activities [Bates 000784]		
183.	Inland Neurosurgery and Spine Records for Jennifer Lane [Bates 000792-000795]		
184.	Outpatient Rehab Medicine Consultation [Bates 000796-000803]		
185.	Outpatient Neurosurgical Consultation for Jennifer Lane [Bates 000804-000807]		

RESPECTFULLY SUBMITTED December 20, 2012.

JERRY J. MOBERG & ASSOCIATES

/s/ Jerry J. Moberg _____
 Jerry J. Moberg, WSBA # 5282
 Patrick R. Moberg, WSBA #41323
 Attorney for Defendant Grant County

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date I electronically filed the foregoing
3 with the Clerk of the Court using the CM/ECF System which will send
4 notification of such filing to the following:
5

6 Steven C. Lacy
7 steve@lacykane.com
stuart@lacykane.com

8 DATED December 20, 2012 in Ephrata, Washington.
9

10 /s/ Jerry J. Moberg
11 Jerry J. Moberg, WSBA #5282
jmoberg@canfieldsolutions.com
12 Attorney for Defendant